

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Site:	NEW BEDFORD
Dredge:	4.1
Other:	48427

Mr. Tom Dardos
 Detox Industries
 4800 Sugar Grove Blvd.
 Suite 210
 Stafford, TX 77477

Dear Mr. Dardos:

I wanted to more clearly outline some of the potential obstacles in applying Detox to the New Bedford Harbor Superfund Site, as a follow-up to our telephone conversation. Although the Agency emphasizes destruction in our revised NCP (National Contingency Plan, Superfund's overriding guidance document), the prohibitive costs of many new technologies prevent the Region from recommending such technologies as the cost-effective remedy. Further, the NCP also requires that Superfund balance the cost of any remedial actions against all sites nationally placing demands on the Trust Fund. The overall costs of dredging, disposing, and applying Detox are an order of magnitude higher than any other remedy. This fact is a major obstacle and was a factor in the elimination of incineration as a remedial option. Another drawback to incineration was the fact that, although PCBs would be destroyed, the metals would still remain and require special disposal after treatment. Again, Detox presents the same problem. Finally, Superfund emphasis on proven technologies presents another obstacle.

I am outlining these issues only to give you a better understanding of the Superfund program and pressures, and to anticipate a few problems which may face New Bedford. Obviously, Superfund re-authorization will impact many of these issues.

During the past few months, the technical feasibility of dredging has been the most pressing issue on New Bedford as opposed to the issue of disposal. An interagency agreement with the Corps of Engineers has been initiated for technical assistance on New Bedford and EPA has integrated their dredging experts and other personnel into our study team. I have enclosed our most recent recent press release outlining the current status of this site. The disposal and any possible treatment of the contaminated sediments is a highly unresolved issue, which I emphasize to allay any concerns that Detox has been forgotten.

I have pursued research and development (R&D) mechanisms to further test and investigate Detox, through EPA headquarters. My contact in Washington is following-up on a possible precedent for field demonstration which we just received information on. Headquarters is aware of our desire to further test Detox in the context of the New Bedford site. In the interim, I am looking forward to the most recent data on the New Bedford samples and hope to stay in close contact.

SYMBOL

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Prueher
7/16/85

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